UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

ACTION NO: 1:13-CR-024-07

UNITED STATES OF AMERICA

PLAINTIFF

VS.

MOTION TO CONTINUE TRIAL

KELLY HARRISON

DEFENDANT

* * * * * * * * * * * * * * *

Comes now Defendant, Kelly Harrison, by and through counsel, and hereby moves this Court to continue the Trial Date, in the above styled matter, which is currently scheduled for 8th day of December 2014, at the hour of 9:30 a.m.

As grounds for said Motion, Counsel for Defendant states, that additional time is needed due to counsel recently being approved to represent his Client in the state of Ohio. Client also lives several hours away from Counsel's office and that makes it difficult to see him. Counsel has just received discovery and it has been given to client on October 30, 2014. Further, Counsel for Defendant has spoken with the Government which has no objection to said Motion.

WHEREFORE, Defendant respectfully requests the Trial Date be continued.

NOTICE

Please take Notice that the foregoing Motion shall come on for hearing at the convenience of the Court.

Respectfully submitted,

ANGGELIS & GORDON, PLLC 231 Lexington Avenue

Lexington, Kentucky 40508 (859) 255-7761

BY: /s/ Derek G. Gordon

CERTIFICATE OF SERVICE

I hereby certify that on this the 30th day of October, 2014 I electronically filed the foregoing Motion with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to Hon. Tim Oakley.

/s/ Derek G. Gordon

HON. DEREK G. GORDON